Rio Tinto

July 10, 2019

Sent via Electronic Mail

Director, Emergency and Remedial Response Division
Attn: Chief, New Jersey Remediation Branch, Pohatcong Site
United States Environmental Protection Agency Region 2
290 Broadway, 19th Floor
New York, New York 10007

New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency Region 2
290 Broadway, 17th Floor
New York, New York 10007
Attention: Attorney for Pohatcong Site

New Jersey Department of Environmental Protection
ATTN.: Fred Mumford
380 Scotch Road
West Trenton, New Jersey 08628
(*via electronic mail only*)

Re: Monthly Progress Report No. 52
Reporting Period June 1, 2019 to June 30, 2019
2014 Vapor Intrusion Removal Action at the Washington Facility
Pohatcong Valley Groundwater Contamination Superfund Site
Warren County, New Jersey

Dear Pohatcong Consent Decree Notice Recipients:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)[1], Ramboll US Corporation (Ramboll) submits this monthly progress report in compliance with Section X, Paragraph 30 of the CD and Appendix B-3 to the CD, Statement of Work for the 2014 Vapor Intrusion Removal Action at the Washington Facility (2014 VI Removal Action SOW) at the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. This report provides a description of the actions and

[1] In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 14-cv-05798) effective March 11, 2015.

activities undertaken pursuant to the CD and related to the 2014 VI Removal Action SOW during this reporting period and plans, actions and data scheduled in the next 8 weeks.

Actions Taken toward Compliance with Consent Decree, including Community Relations

The following activities were performed during this reporting period:

- The long-term soil vapor extraction (SVE) system and east wall sub-slab depressurization system (SSDS) continued operation during this reporting period. The SVE system is currently operating at an overall vacuum of 7 inches Hg with an average inlet flow rate of approximately 440 cubic feet per minute (CFM).

- During this period the 500 CFM SVE system operated 81% of the time (i.e., a total of 587 hours over 30 days) and the east wall SSDS operated 100% of the time.

- The Monthly Progress Report No. 51 for the VI Removal Action at the Washington facility reporting May 2019 activities was submitted to the USEPA in a letter dated June 10, 2019.

- Ramboll collected sub-slab vapor monitoring port vacuum and photoionization detector (PID) measurements on June 27, 2019. These measurements and the SVE blower runtime for the June 2019 reporting period are included in the summary table in Attachment 1. The locations of the SSDS wells and vapor monitoring points are provided in Attachment 2.

Routine OM&M Events:

The following routine OM&M events were conducted during this reporting period:

- The drive belts on the SVE blower were replaced.

Problems Encountered, Actions Taken and Their Resolutions

The following problems were encountered during this reporting period:

- On June 6, 2019, the SVE system shut down briefly to replace the thermoplastic hose between the blower and the vapor phase granular activated carbon unit.

- Several unplanned shutdowns of the SVE system occurred between June 6 and 30, 2019, due to electrical power interruptions at the Albéa facility and from SVE blower discharge high temperature alarms. Troubleshooting efforts on the SVE system and blower high temperature switch revealed that the unplanned shutdowns were occurring on days when the outdoor temperature was in excess of 90 degrees Fahrenheit resulting in a high ambient temperature within the SVE system enclosure. Furthermore, troubleshooting of the SVE blower high temperature switch revealed that the setpoint required adjustment to accommodate higher ambient temperatures. Options for reducing the temperature within the SVE system enclosure are currently being evaluated.

Analytical Results and Data Received During the Reporting Period

The following analytical data were received during this reporting period:

- None during this period.

Anticipated Plans, Actions and Data Scheduled (during the Next 8 weeks)

The following activities are planned for the next eight weeks:

- One round of measurements of the SVE system and SSDS is planned to be performed in July 2019.

Delays Encountered or Anticipated, and Efforts Taken to Mitigate

The following delays were encountered during this reporting period:

- None during this period.

Closing

If you have any questions or comments regarding this monthly progress report, please feel free to contact me.

Sincerely,

Luis Hidalgo

Luis Hidalgo
Project Coordinator

Attachments:
(1) SVE/SSDS Measurements, June 27, 2019
(2) Locations of SVE Wells, SSDS Extraction Wells, and Vapor Monitoring Points

cc: V*ia Electronic Mail*
Michelle Granger – USEPA, Region 2
Dave Cline – Rio Tinto
Jeff Armington – Rio Tinto
Bruce White – Barnes & Thornburg LLP
Daniel Fortaney, Albéa Americas
Felix Miranda, Albéa Americas
Russell Gladd, Albéa Americas
Bruce Kennington – Ramboll

ATTACHMENT 1

SVE/SSDS Measurements

June 27, 2019

SVE/SSDS Measurements, June 27, 2019
Vapor Intrusion Response Activities
Albéa Americas, Washington Facility
191 Route 31 North, Washington, Warren County, New Jersey

Sub Slab Measurement Location	PID (ppm)	Vacuum (inches of water)
CDM-SS-01	0.816	-1.078
CDM-SS-02N	1.083	-0.030
CDM-SS-02S	1.688	-0.040
CDM-SS-03	4.161	-0.014
CDM-SS-04	1.145	-0.030
CDM-SS-05	2.124	-0.001
CDM-SS-06	0.875	-0.001
[1] CDM-SS-07	--	--
CDM-SS-08	2.872	-0.515
[1] CDM-SS-09	--	--
CDM-SS-10	0.920	-0.001
EPA-SS-11	0.966	-0.009
EPA-SS-12	4.915	-1.042
EPA-SS-13	0.977	-0.009
EPA-SS-14	0.798	-0.001
EPA-SS-15	1.010	-0.001
EPA-SS-16	1.911	-0.010
EPA-SS-17	2.001	-0.027
EPA-SS-18	1.556	-0.041
EPA-SS-19	1.701	-0.056
EPA-SS-20	2.925	-0.003
EPA-SS-21	3.981	-0.094
EPA-SS-22	4.540	-0.376
EPA-SS-23	1.779	-0.007
EPA-SS-24	3.301	-0.535
EPA-SS-25	0.002	-0.002
[1] EPA-SS-26	---	---
[1] EPA-SS-27	---	---
EPA-SS-28	1.009	-0.043
EPA-SS-29	6.291	-0.380
EPA-SS-30	0.641	-0.419
EPA-SS-31	0.538	-0.077
EPA-SS-32	0.958	-0.065
VP-2	4.423	-0.503
VP-3	4.005	-0.379
[1] VP-7	---	---
VP-10	4.202	-0.102
VP-11	4.398	-0.002
VP-12	1.452	-0.043
VP-13	1.545	0.000
[1] VP-14	---	---
[1] VP-15	---	---
VP-16	4.252	-0.194

SVE/SSDS Measurement Location	PID (ppm)	Vacuum (inches of water)
SSDS-01	1.764	-30
SSDS-02	1.533	-37
SSDS-03	1.488	-13
SSDS-04	1.052	-38
SSDS-05	1.617	-4
[2] SSDS-06	5.800	-18
[2] SSDS-07	7.894	-18
[2] SSDS-08	5.869	-20
[2] SSDS-09	7.057	-6
[2] SSDS-10	5.957	-5
[3] SVE-1	3.536	--
[3] SVE-2	1.981	--
[3] SVE-3	3.131	--
[3] SVE-4	6.100	--
[3] SVE-5	2.005	--
[3] SVE-6	2.380	--
[3] SVE-7	9.248	--
[3] SVE-8	1.512	--
[3] SVE-9	1.742	--
[3] SVE-10	3.566	--
[3] SVE-11	5.320	--
[3] SVE-12	3.735	--
[3] SVE-13P	8.039	--
[3] SVE-14P	1.990	--
[3] SVE-15P	3.855	--
[3] SVE-16P	4.551	--

Vapor Phase GAC Measurements	
Location	PID (ppm)
[3] VGAC1 IN	---
[3] VGAC1 OUT	---
[3] VGAC2 OUT	---

Summary of SVE Blower Runtime for Reporting Period	
Hour Meter at end of Previous Reporting Period (Hours)	1,344
Hour Meter at end of Current Period (6/30/2019) (Hours)	1,931
Total SVE Blower Runtime for Reporting Period (Hours)	587

Notes:

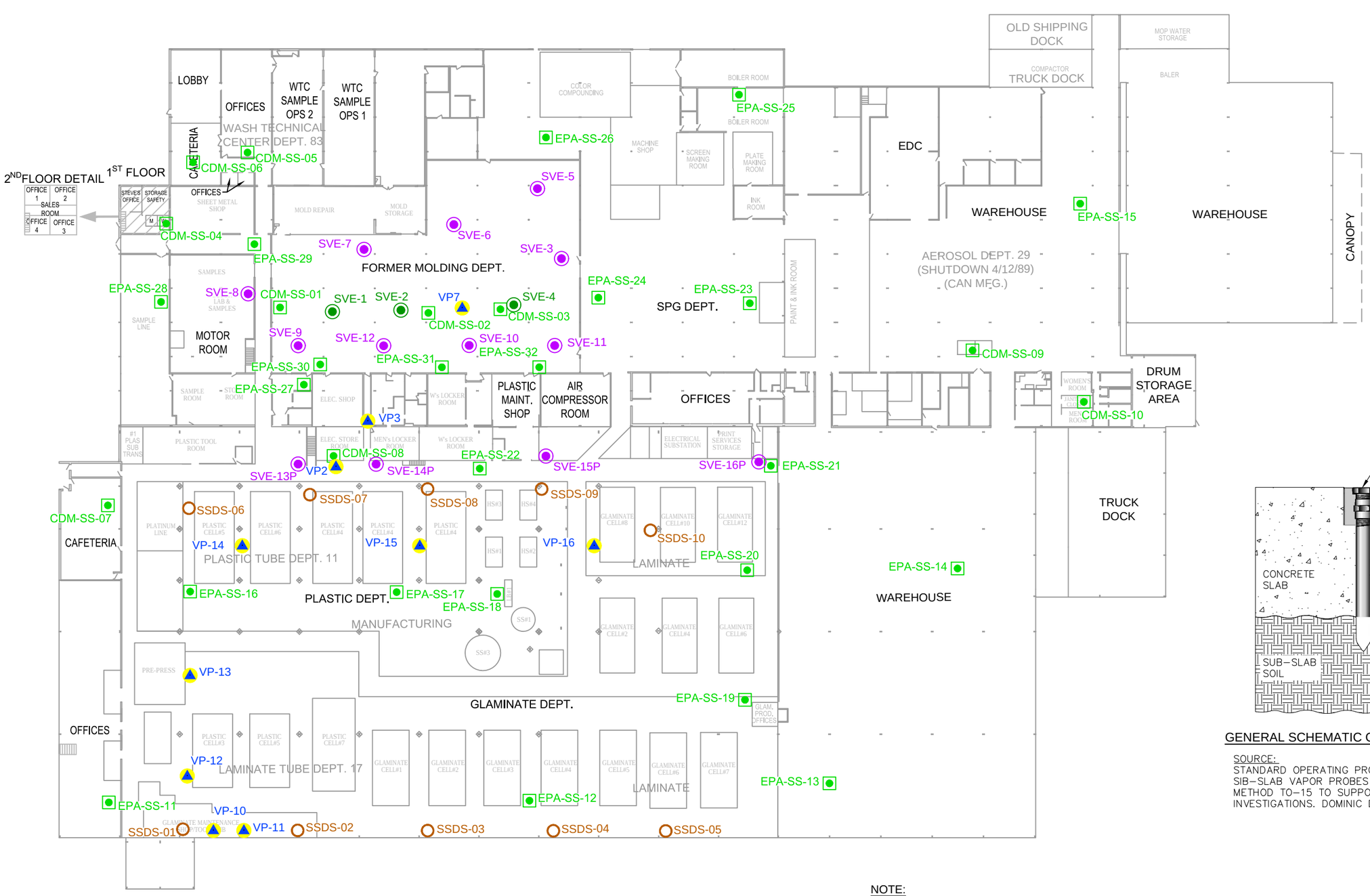
1 Vapor monitoring point not accessible; no measurement collected.

2 Locations SSDS-06 through SSDS-10 (West Wall) are for standby use only and were operational at the time of measurement.

3 An unplanned shutdown of SVE occurred on June 27, 2019 during the measurement event and vacuum readings from the SVE extraction points were erroneous.

ATTACHMENT 2

Locations of SVE Wells, SSDS Extraction Wells, and Vapor Monitoring Points



GENERAL SCHEMATIC OF SUB-SLAB VAPOR PROBE.

SOURCE:
STANDARD OPERATING PROCEDURES FOR INSTALLATION OF SIB-SLAB VAPOR PROBES AND SAMPLING USING EPA METHOD TO-15 TO SUPPORT VAPOR INTRUSION INVESTIGATIONS. DOMINIC DIGIULIO, USEPA.

NOTE:
INTERNAL BUILDING DELINEATIONS ARE APPROXIMATE.

0 60
SCALE IN FEET

TPENNISI 10/13/15 [SMPL_VAC&PID_0211697_] F:\0211697_FINAL VI REPORT

RAMBOLL ENVIRON

DRAFTED BY: MSB/KPM | DATE: 07/21/2014

LOCATIONS OF SVE WELLS, SSDS EXTRACTION WELLS, AND VAPOR MONITORING POINTS

VAPOR INTRUSION RESPONSE ACTIVITIES
ALBÉA AMERICAS, WASHINGTON FACILITY
191 RT 31 NORTH, WASHINGTON, WARREN COUNTY, NJ

ATTACHMENT 2

0211697J